Subscriber Acknowledgement Report

November 23, 2005

Re:
WC Docket No. 05-196
WC Docket No. 04-36

Submitted by:
Clarity Telecommunications, LLC
35715 US HWY 40
Suite D104
Evergreen, Colorado 80439

1. **911 Solution:**
    a. Percent of Subscribers to whom compliant 911 services are presently available: 27%

    We obtain 911 transport services from Affinity VOIP Telecom, Inc., which enable us to use the V9-1-1™ solution provided by Intrado. Through Intrado, Affinity VOIP Telecom, Inc., enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Through Intrado, Affinity VOIP Telecom, Inc., manages the VPC functionality and the Call delivery component on our behalf thereby enabling a full end to end solution from one service provider.

    Our only customer requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Affinity VOIP Telecom, Inc., via a real-time interface and their connectivity to the Intrado network to enable live 9-1-1 call delivery.

    b. Detailed description of the technical solution
        i. 911 Routing Information/Connectivity to Wireline E911 Network

        Currently through the assistance of Affinity VOIP Telecom, Inc., and their ability to transport our 911 calls to Intrados network, we will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and the attached Major Market Deployment Map and the VoIP Deployment Plan reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

        ii. Transmission of ANI and Registered Location Information

Basic PSAP: Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, please refer to the enclosed "Basic PSAP" provided by Intrado. While these areas are not included within the FCC Order and are not required for compliance, Intrado has indicated that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.

ANI Only: There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. This information should be considered as part of the compliance report to the Commission. We are currently aware of four (4) States and a Territory within our serving area that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

New Jersey - In the State of New Jersey Intrado has gained permission from the State to deploy a voice only service which includes the call taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

Hawaii - To date, Hawaii has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

Percent of PSAPS within our service area that are capable of receiving and processing ANI and Registered Location information that we transmit: 27%

Percent of Subscribers within our service area whose ANI and Registered Location information are being transmitted: 100%

iii. 911 Coverage

Through our 911 transport provider and Intrado, we are working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on our customer subscriber base priorities. The attached "Major Market Deployment Map", which corresponds with MSAs, identifies regions within our territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This map was provided by Intrado and is used to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

2. Obtaining Initial Registered Location Information:

a. Description of actions taken to obtain registered location data for subscribers

i. Dates: At the time of registration for all new subscribers and on an ongoing basis via daily emails and phone calls to subscribers for whom we know their email address and phone number.

ii. Methods: Using known email addresses, postal addresses and phone numbers, we have attempted to obtain customers location data. As a component of the V9-1-1 Service and through Affinity VOIP Telecom, Inc., the we have access to the Intrado Validation

and Update Interface (VUI) which enables near real-time delivery of the our acquired or our User submitted address update information. We have integrated VUI into our existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

iii. Percent from whom obtained location data: 67%

3. Obtaining Updated Registered Location Information:

a. Description of location update method including how CPE can be used to update:

The V9-1-1™ Mobility Services provided by Affinity VOIP Telecom, Inc. throught Intrado includes a real-time provisioning interface to provision/register subscriber (location) data to Intrado to ensure the proper address and call back number is delivered to the appropriate PSAP at the time of a VoIP 9-1-1 call. This interface is named the Validation and Update Interface (VUI). Intrado's real-time provisioning process enabled by VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation at the time of provisioning. Our customers use the Affinity VOIP Telecom, Inc., provided web portal or our own call service center from their phone to enable the near real-time update to Intrado.

At the time of the VoIP 9-1-1 call Intrado uses the our customers provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and Call Back Number of the user.

Intrado also enables us, through Affinity VOIP Telecom, Inc. to utilize the Intrado Level of Service (LoS) query integrated into the VUI application. This functionality enables a real-time query to Intrado with an address of a customer/end user for the purpose of determining the level of E9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable the user to determine E9-1-1 service level and take appropriate action.

4. Technical Solution for Nomadic Subscribers:

a. Description of technology for nomadic 911 use:

We are able to route VoIP emergency calls from our VoIP network to Affinity VOIP Telecom, Inc. who in turn transports the call to the Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the Validation and Update Interface (VUI) the V9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.